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9 -and-

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15 UNITED STATES DISTRICT COURT
16 DISTRICT OF NEVADA

17 KASHIF SHANKLE as Special Administrator of
the Estate of JUAN JOSE AGUILAR
18 TALAVERA, deceased; MICHELLE DENISSE
AGUILAR GONZALEZ, as Heir to the Decedent
19 JUAN JOSE AGUILAR TALAVERA, deceased;
HEITRIAN NAXYELI AGUILAR GONZALEZ,
20 as Heir to the Decedent JUAN JOSE AGUILAR
TALAVERA, deceased; and ZIANYA NATALIA
21 MARISA AGUILAR GONZALEZ as Heir to the
Decedent JUAN JOSE AGUILAR TALAVERA,
22 deceased, and Kashif Shankle as Special
Administrator of the Estate of LUIS OVIDIO
23 GONZALEZ FLORES, deceased, PABLO
GONZALEZ GONZALEZ, as Heir to the
24 Decedent, LUIS OVIDIO GONZALEZ FLORES,
25 deceased; LORENA GUADALUPE FLORES
BARRON as Heir to the Decedent, LUIS OVIDIO
26 GONZALEZ FLORES, deceased, and INGRID
YANEL ALONSO MORALES, INDIVIDUALLY
27 AND AS NEXT FRIEND OF L.M.G.A., A Minor
28 as Heirs to the Decedent, LUIS OVIDIO

CASE NO.: 2:21-cv-01065-JAD-NJK

**STIPULATION AND ORDER TO
STAY
SUBMITTED IN COMPLIANCE WITH
LR 26-1(b)**

1 GONZALEZ FLORES, deceased,
2 Plaintiffs,

3 v.

4 TVPX AIRCRAFT SOLUTIONS INC., a
5 foreign corporation; COMPAÑÍA DE
6 AVIACIÓN Y LOGISTICA EMPRESARIAL
7 S.A. DE C.V. a foreign company; and TVPX
8 2017 MSN 5043 BUSINESS TRUST, a
9 foreign company; NABOR BONILLA
10 CALDERA, an individual; ATLANTIC
11 AVIATION FBO INC., a foreign corporation;
12 DOES 1 through 10; ROE ENTITIES 11
13 through 20; and ABC LIMITED LIABILITY
14 COMPANIES 21 through 30,

15 Defendants.

16 The parties, Plaintiffs Kashif Shankle, as Special Administrator of the Estates of Juan Jose
17 Aguilar Talavera and Luis Ovidio Gonzalez Flores, et al., and Defendants TVPX Aircraft Solutions
18 Inc., et al., by and through their undersigned counsel, hereby stipulate as follows pursuant to Fed.
19 R. Civ. P. 15(a)(2):

20 WHEREAS, the Parties referenced hereinabove have filed their Joint Status Report [**Doc.**
21 **20**] on July 7, 2021 requesting this Court to stay the July 26, 2021 deadline to enter a discovery
22 plan/scheduling order until the Court has entered an Order on Plaintiffs' Motion to Remand [**Doc. 19**].

23 WHEREAS, Plaintiffs' counsel represents that service was initiated through the Hague
24 Convention for Defendants Nabor Bonilla Caldera and Compañía De Aviación Y Logistica
25 Empresarial S.A. De C.V. on May 27, 2021. No service documents have been filed in the state court
26 action at the time of removal on June 4, 2021 and Defendants have no information on when or if service
27 was initiated through the Hague Convention, other than what has been represented by Plaintiffs' counsel.
28 No appearance has been made by either Defendant, Nabor Bonilla Caldera or Defendant, Compañía De
Aviación Y Logistica Empresarial S.A. De C.V., and thus the parties herein are not representing a
position for them in this stipulation and order to stay.

WHEREAS, the Parties herein agree that this Court should stay the July 26, 2021, deadline to enter a discovery plan/scheduling order until the Court has entered an Order on Plaintiffs' Motion to Remand [Doc. 19] in this matter.

IT IS STIPULATED AND AGREED BY THE PARTIES that all activity in this case shall be stayed until such time that this Court has reviewed the papers of this case and has decided a ruling on Plaintiffs' Motion to Remand [Doc. 19] herein.

DATED this 26th day of July, 2021.

THE WEBSTER LAW FIRM

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Solutions Inc. and TVPX 2017 MSN 5043
Business Trust*

IT IS SO ORDERED.

Dated this 4 day of August, 2021.



Gloria M. Navarro, District Judge
UNITED STATES DISTRICT COURT

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I am an employee of THE WEBSTER LAW FIRM and that service of the foregoing **STIPULATION AND ORDER TO STAY** was made on the 26th day of July 2021, to all parties and counsel as identified on the Court-generated Notice of Electronic Filing system.

/s/Vanessa Aguirre

An employee of THE WEBSTER LAW FIRM